



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 29, 2005

OFFICE OF
RESEARCH AND DEVELOPMENT

Dear Members of the World Trade Center Expert Technical Review Panel,

I am writing you to explain the direction the U.S. Environmental Protection Agency will take regarding efforts to monitor current environmental conditions for residences and commercial buildings impacted by the collapse of the World Trade Center (WTC).

The Draft Final Plan for this effort was posted on the panel web site (www.epa.gov/wtc/panel) on June 30, 2005, and was presented and discussed at the last meeting of the panel on July 12, 2005. As you are all aware, this plan provided for two courses of action, depending upon the outcome of an external expert peer review of EPA's WTC Dust Screening Method Study. The results of that peer review have been received and were recently posted on the panel's web site. The peer review concluded that, "EPA has not made the case that its proposed analytical method can reliably discriminate background dust from dust contaminated with WTC residue," and that, "The proposed method has not demonstrated the utility of slag wool as a successful signature constituent."

EPA is very disappointed that the peer review did not sustain our belief that a scientifically sound screening method has been identified and validated. Because the contaminants of potential concern identified through the efforts of the panel and EPA are also ubiquitous in urban environments, a screening method to reliably attribute contaminants to the WTC collapse was critical to the objectives of determining the geographic extent of remaining WTC contamination and assuring that any potential cleanups could be linked to the collapse and not urban pollutant background.

Both the external expert peer reviewers, as well as some individual members of the WTC Expert Technical Review Panel, have suggested additional research and field studies that might be able to improve the screening method to the point it could be effective in differentiating WTC dust from background. EPA has reviewed and carefully considered these proposed activities. While we appreciate this thoughtful input, we do not believe that the probability of success of these activities is sufficient to warrant diversion of limited resources available for the sampling and cleanup effort. In addition, given the significant amount of time that has lapsed since the collapse and since the formation of the panel, we believe it is more important at this point to move ahead with implementation of sampling.

Consequently, EPA has decided to proceed with the approach outlined on pages 19-21 in the June 30, 2005, Final Draft Sampling Plan. This calls for a voluntary test and clean program, targeted at the area south and west of Canal, Allen and Pike Streets. The Draft Final Plan has been revised to reflect this decision and is enclosed as the Final Test and Clean Program Plan. The sampling and analytical methods, QA/QC and cleanup benchmarks remain largely the same as in the June 30, 2005, Draft Final Plan. EPA will implement this effort utilizing the \$7 million in FEMA funding that has been earmarked for this program.

One notable change from the June 30, 2005, Draft Final Plan is the inclusion of air sampling for asbestos and man-made vitreous fibers (MMVF) in addition to surface sampling. Cleanups will be offered if either the surface loadings or air benchmarks are exceeded. Clearance sampling for asbestos and MMVF following a cleanup will be based on air measurements. EPA believes that this addition is necessary to assure that scientifically defensible, health-based cleanup benchmarks are utilized for all contaminants of potential concern.

We will review the Final Test and Clean Program Plan with you at the December 13, 2005, panel meeting. The primary focus, however, will be to discuss the implementation of the plan. EPA Region 2 in New York is developing a Recruitment Strategy. An outline of the Recruitment Strategy is enclosed. The Recruitment Strategy adopts the techniques and processes that were most effective in EPA Region 2's 2002-3 Indoor Air Residential Assistance Program. We will welcome input from individual panel members and the public at the panel meeting and beyond on the most efficient and effective ways to gain participation in the program.

The panel has also benefited from numerous presentations on the results of studies that have examined potential health impacts from the WTC collapse. The panel has also been briefed on the status of the WTC health registry which currently has over 70,000 registrants. There has also been some increase in funding for the registry, new advisory panels have been formed by the New York City Department of Health and Mental Hygiene and the Agency for Toxic Substances and Disease Registry, including workers and members of the public, and there has been an increase in collaborative efforts between the registry and the academic community. Panel member recommendations to maintain the registry beyond 20 years and to link the results of subsequent indoor testing to the registry have been provided to the appropriate agencies.

EPA greatly appreciates the dedication and hard work of the panel members over the last 21 months. Your individual inputs have had considerable impact upon the nature and direction of this effort. As we move into implementation of the Test and Clean Program, we believe that the need for continuing technical input will be considerably diminished. In addition, for this new phase EPA believes that interaction with concerned citizens needs to be managed closer to the work, not from Washington. Accordingly EPA has decided to bring the efforts of the WTC Expert Technical Review Panel to a close as of the December 13, 2005, meeting in New York.

This has been a challenging and sometimes confrontational process. You all should feel proud of your dedicated participation and be satisfied in the knowledge that all inputs to this process were given full consideration by EPA all along the way.

On a personal level, I have enjoyed working with all of you in what has been one of the more challenging efforts of my career. As you may know, I have recently returned to my permanent position in Cincinnati, and I will retire from EPA in January after almost 36 years of research in support of virtually every aspect of EPA's mission. I thank you for your dedicated efforts on behalf of the EPA and the citizens of New York. I want to especially thank Dr. Paul Liroy for all of his support to me and for his tireless efforts while serving as Vice Chair of the panel. I look forward to seeing you in December and wish you the best in your future efforts in support of public health and environmental protection.

Sincerely,

A handwritten signature in cursive script that reads "E. Timothy Oppelt".

E. Timothy Oppelt
Interim Chair
WTC Expert Technical Review Panel

Enclosures